

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, ROSALIE §
WEISFELD, AUSTIN JUSTICE §
COALITION, COALITION OF TEXANS §
WITH DISABILITIES, MOVE TEXAS §
CIVIC FUND, LEAGUE OF WOMEN §
VOTERS OF TEXAS, and AMERICAN GI §
FORUM OF TEXAS, INC., §

Plaintiffs

v. §

Civil Case No. 5:19-cv-00963

TEXAS SECRETARY OF STATE, TRUDY §
HANCOCK, in her official capacity as §
BRAZOS COUNTY ELECTIONS §
ADMINISTRATOR, and PERLA LARA in §
her official capacity as CITY OF MCALLEN, §
TEXAS SECRETARY, §

Defendants. §

**UNOPPOSED MOTION TO EXTEND DEADLINE AND PAGE LIMIT FOR
PLAINTIFFS' CONSOLIDATED RESPONSE TO DEFENDANTS' MOTIONS TO
DISMISS**

TO THE HONORABLE ORLANDO GARCIA JR., CHIEF U.S. DISTRICT JUDGE:

Plaintiffs respectfully request the Court extend their deadline to respond to the motions to dismiss filed by Defendant Perla Lara, in her official capacity as City of McAllen, Texas Secretary (“the City Secretary”) (Doc. 27), Defendant Trudy Hancock, in her official capacity as Brazos County Elections Administrator (“the Brazos County EA”) (Doc. 29), and Defendant Texas Secretary of State (“the Texas SOS”) (Doc. 30), to October 23, 2019. Because Plaintiffs intend to file a consolidated response to all three motions to dismiss, they additionally request an extension of the page limit for that response, from 20 pages to 40 pages. Plaintiffs have conferred with counsel for all three Defendants, and none are opposed to these requests.

Plaintiffs bring the requested deadline extension in good faith and not for the purpose of delay. The current deadline to respond to the Brazos County EA's motion to dismiss is October 18, 2019, while the deadline to respond to the City Secretary's and the Texas SOS's motions to dismiss is October 21, 2019. The requested extension of time to respond to the three pending motions to dismiss thus ranges from only 2 to 5 additional days. Plaintiffs ask for this additional time because it is needed to adequately consolidate their responses to all three of Defendants' motions to dismiss. This consolidation unifies the briefing, much of which would be duplicative across multiple responses, and will conserve the parties' and the Court's resources.

Plaintiffs ask for a page-limit extension for the same reasons. Rather than file three separate responses to Defendants' motions to dismiss, each with its own limit of 20 pages, *see* W.D. Tex L. R. Civ. P. 7(e), Plaintiffs seek to file a consolidated response of up to 40 pages. Plaintiffs' request is in good faith and not for purposes of delay.

Finally, the requested extensions will not prejudice any of Defendants. Plaintiffs conferred with counsel for the City Secretary, the Brazos County EA, and the Texas SOS, and none oppose this motion.

Accordingly, Plaintiffs respectfully ask the Court grant their request to extend the deadline for their consolidated response to the City Secretary's Motion to Dismiss (Doc. 27), the Brazos County EA's Motion to Dismiss (Doc. 29), and the Texas SOS's Motion to Dismiss (Doc. 30), to October 23, 2019, as well as Plaintiffs' request for an extension of the page limit for their consolidated response, from 20 pages to 40 pages.

Dated: October 16, 2019.

Respectfully Submitted,

/s/ Zachary Dolling

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CERTIFICATE OF SERVICE

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on October 16, 2019 through the Electronic Case File System of the Western District of Texas.

/s/ *Zachary Dolling*

CERTIFICATE OF CONFERENCE

I certify that on October 16, 2019, Plaintiffs' counsel conferred via email with Isaac J. Tawil, counsel for Defendant Perla Lara, in her official capacity as City of McAllen, Texas Secretary, Eric Magee, counsel for Defendant Trudy Hancock, in her official capacity as Brazos County Elections Administrator, and Anna Mackin, counsel for Defendant Texas Secretary of State. They are not opposed to the extensions requested here.

/s/ *Zachary Dolling*